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26 Attorneys for Plaintiff and
27 Counterdefendant Moog Inc.

28 **UNITED STATES DISTRICT COURT**
CENTRAL DISTRICT OF CALIFORNIA

MOOG INC.,

Plaintiff,

v.

SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and
DOES NOS.1-50,

Defendants.

Case No. 2:22-cv-09094-GW-MAR

**DECLARATION OF KAZIM A.
NAQVI IN SUPPORT OF JOINT
STIPULATION RE: PLAINTIFF'S
OPPOSITION TO DEFENDANT'S
MOTION TO ENFORCE ORDER
COMPELLING TRADE SECRET
IDENTIFICATION**

Judge: Hon. Margo A. Rocconi
Location: Courtroom 790, 7th Floor

DECLARATION OF KAZIM A. NAQVI

1
2 1. KAZIM NAQVI, under penalty of perjury and pursuant to 28 U.S.C.
3 § 1746, declares the following to be true and correct:

4 2. My name is Kazim Naqvi. I am an associate at Sheppard, Mullin,
5 Richter & Hampton LLP. I am over the age of 18 years old. I have personal
6 knowledge of the matters set forth herein and if called as a witness, I could and
7 would competently testify as to all facts set forth herein. I am counsel for plaintiff
8 and counterdefendant Moog Inc. (“Moog”) and I provide this declaration in
9 support of Moog’s portions of the Joint Stipulation which oppose Defendant and
10 Counterclaimant Skyryse, Inc.’s (“Skyryse”) Motion to Enforce Order Compelling
11 Trade Secret Identification.

12 3. Attached hereto as **Exhibit 1** are true and correct copies of screen
13 captures from the excel spreadsheets containing the file listings referenced in
14 Moog’s trade secret identification (served on May 21, 2023), which were originally
15 attached, in native excel format, to Moog’s trade secret identification as exhibit 2
16 (non-CUI file listing) and exhibit A (CUI file listing). The screen captures
17 demonstrate that the non-CUI file listing was broken into 48 separate excel tabs
18 keyed to specific trade secrets (with each separate tab reflected at the bottom of
19 each screen capture), and the CUI file listing was broken into 6 separate excel tabs
20 keyed to specific trade secrets.

21 4. Attached hereto as **Exhibit 2** is a true and correct copy of a publicly
22 available version of the identification of trade secrets from *WeRide Corp. v. Kun*
23 *Huang*, Case No. 5:18-cv-07233-EJD, Dkts. 33-28 (Dec. 26, 2018).

24 5. Attached hereto as **Exhibit 3** is a true and correct copy of the law
25 school journal article by Charles Tait Graves & Brian D. Range, Identification of
26 Trade Secret Claims in Litigation: Solutions for A Ubiquitous Dispute, 5 Nw. J.
27 Tech. & Intell. Prop. 68 (2006), as it appears in the Westlaw database.
28

1 I declare that the foregoing is true and correct under penalty of perjury
2 under the laws of the United States of America.

3 Executed this 4th day of May, 2023, in Los Angeles, California.

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5 Dated: May 4, 2023

6 /s/ Kazim A. Naqvi

7 Kazim Naqvi
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ATTESTATION

Pursuant to Civil Local Rule 5-4.3.4, I, Gabriel S. Gross, attest that
concurrence in the filing of this document has been obtained by all its signatories.

Dated: May 9, 2023

/s/ Gabriel S. Gross

Gabriel S. Gross